

REMARKS

Reconsideration and allowance of the present patent application based on the foregoing amendments and following remarks are respectfully requested.

By this Amendment, claims 1, 11-12 and 18 are amended and claims 28-29 are newly added. Claim 12 is amended to correct a clerical error. Support for the amendment to claims 1, 11 and 18 and new claims 28-29 may be found, for example, in the embodiment shown in FIG. 2A of the present patent application. No new matter has been added. Accordingly, after entry of this Amendment, claims 1-29 will remain pending in the patent application.

Claims 1-27 were rejected under 35 U.S.C. 102(b) based on Yokoyama *et al.* (U.S. Pat. No. 6,099,598) (hereinafter “Yokoyama”). The rejection is respectfully traversed.

Claim 1 is patentable over Yokoyama at least because this claim recites an integrated lithographic fabrication cluster system comprising, *inter alia*, a wafer handling controller to control said wafer handling apparatus, the wafer handling controller in communication with the exposure controller and the track controller. Yokoyama does not disclose, teach or suggest these features.

The cited portions of Yokoyama disclose a fabricating system including a plurality of processing apparatuses connected to each other by means of an inter-apparatus transporter. (See, e.g., FIG. 21 of Yokoyama). The fabricating system includes two lithographic apparatuses 301, 302, an inter-apparatus transporter 308 and a plurality of processing chambers 303-307. *Id.* A computer 805 (identified by the Office Action as the “cluster controller” of claim 1) is in communication with computers 802a and 802b, which control, respectively, the first and second lithographic apparatuses, and computers 802c-802e, which control, respectively, the film dry etching apparatus 802c, the metal etching apparatus 802d and the wet cleaning apparatus 802e. (See, e.g., FIG. 42 and col. 50, lines 42-67 of Yokoyama). The cited portions of Yokoyama also disclose a distributed computer to control the inter-apparatus transporter. (See, e.g., col. 50, lines 49-52 of Yokoyama).

However, unlike claim 1, the cited portions of Yokoyama are silent as to a wafer handling controller in communication with an exposure controller and a track controller. Yokoyama merely discloses that the computer 805 (identified by the Office Action as the “cluster controller” of claim 1) is in communication with lithographic computer 802a (which most closely corresponds to the exposure controller of claim 1), lithographic computer 802b, film dry etching apparatus computer 802b, metal etching apparatus computer 802d and wet

cleaning apparatus computer 802e, via communication line 807b. (See, e.g. col. 50, lines 42-67 and FIG. 42 of Yokoyama). The cited portions of Yokoyama also disclose a distributed computer to control the inter-apparatus transporter. (See, e.g., col. 50, lines 49-52 of Yokoyama). However, even assuming the computer 805 of Yokoyama is in communication with the distributed computer to control the inter-apparatus transporter, which Applicants do not concede, the cited portions of Yokoyama fail to disclose, teach or suggest a system in which the distributed computer that controls the inter-apparatus transporter is in communication with the distributed computer 802a that controls the lithographic apparatus 801a and a distributed computer that controls the track apparatus. Yokoyama merely discloses, at best, a system in which the computers 802a-e are in separate communication with the central computer 805. Thus, Yokoyama cannot anticipate claim 1.

Claims 2-10 are patentable over Yokoyama at least by virtue of their dependency from claim 1 and for the additional features recited therein.

Claim 11 is patentable over Yokoyama for at least similar reasons as provided above in claim 1 and for the additional features recited therein. Namely, claim 11 is patentable over Yokoyama at least because this claim recites an integrated lithographic fabrication cluster system comprising, *inter alia*, a wafer handling controller to control said wafer handling apparatus, the wafer handling controller in communication with the exposure controller and the track controller. As mentioned previously, Yokoyama does not disclose, teach or suggest these features.

Claims 12-17 are patentable over Yokoyama at least by virtue of their dependency from claim 11 and for the additional features recited therein.

Claim 18 is patentable over Yokoyama for at least similar reasons as provided above in claim 1 and for the additional features recited therein. Namely, claim 18 is patentable over Yokoyama at least because this claim recites a substrate manufacturing method comprising, *inter alia*, accessing, by said cluster controller, input control data from at least one of said exposure apparatus controller, said wafer handling apparatus controller, and said wafer track apparatus controller, to determine information required for operations by at least one of said exposure apparatus, said wafer handling apparatus, and said wafer track apparatus, respectively, the wafer handling controller in communication with the exposure controller and the track controller. As mentioned previously, Yokoyama fails to disclose, teach or suggest these features.

Claims 19-27 are patentable over Yokoyama at least by virtue of their dependency from claim 18 and for the additional features recited therein.

Accordingly, reconsideration and withdrawal of the rejection of claims 1-27 under 35 U.S.C. 102(b) based on Yokoyama are respectfully requested.

New claims 28-29 are added to define additional subject matter that is novel and non-obvious. New claims 28-29 are patentable over the art of record at least by virtue of their dependency from claims 1 and 11, respectively.

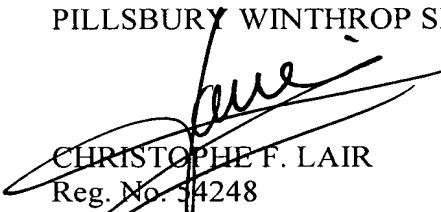
The rejection having been addressed, Applicants respectfully submit that the application is in condition for allowance, and a notice to that effect is earnestly solicited.

If any point remains in issue which the Examiner feels may be best resolved through a personal or telephone interview, please contact the undersigned at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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